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Federal Communications CommissionFEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

WASHINGTON, D. C. 20554

In the Matter of)
)
 Advanced Television Systems) MM Docket No. 87-268
 And Their Impact Upon The)
 Existing Television Broadcast Service)

To: The Commission

**SUPPLEMENT TO PETITION FOR PARTIAL RECONSIDERATION OF
 SIXTH REPORT AND ORDER**

The Jet Broadcasting Co., Inc. ("Jet"), licensee of UHF Television Broadcast Station WJET-TV (ABC, Channel 24), Erie, Pennsylvania, hereby supplements its Petition for Partial Reconsideration of the Sixth Report and Order in MM Docket No. 87-268 (FCC 97-115, released April 21, 1997). This Supplement is filed in response to the Commission's Order (DA 97-1377, released July 22, 1997) permitting the parties to file supplemental information with respect to individual allotments as a result of the Commission's release of OET Bulletin No. 69.

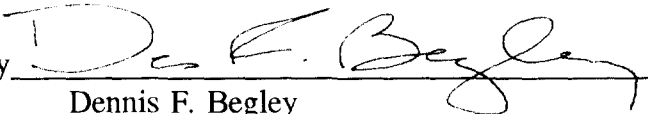
As previously noted by Jet, Station WJET-TV was assigned Channel 58 as its DTV allocation. This out-of-core channel places WJET-TV in a serious competitive disadvantage and forces it to ultimately move to a core channel in order to continue DTV programming. In its original petition, Jet noted that alternative core channels appear to be available for WJET-TV. Of those available channels, Jet noted that Channel 42 appeared to be the most feasible and requested that it be assigned to WJET-TV for DTV operation.

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As noted by the attached engineering statement of duTreil, Lundin & Rackley, Channel 42 does appear to be consistent with the Commission's allocation guidelines and should be available for assignment to Erie, Pennsylvania. While minor potential interference may impact WPTT-TV, Pittsburgh, Pennsylvania and CKCD-TV3, Sarnia, Ontario, the use of lower power or a directional antenna could be utilized to protect these stations.

Accordingly, Jet hereby reiterates its request that the Commission reallocate a core channel -- preferably Channel 42 -- to WJET for DTV operation. Such an assignment will permit Jet to immediately finalize its plans for DTV operation and to construct the facility on an expedited basis. As previously noted, Jet plans to be the first DTV operation in Erie and shares the Commission's commitment to a rapid roll out of DTV operations. However, this plan can only be implemented if Jet is allocated a frequency it can utilize at its present site.

THE JET BROADCASTING CO., INC.

By 
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August 22, 1997

du Treil, Lundin & Rackley, Inc.

A Subsidiary of A.D. Ring, P.A.

TECHNICAL STATEMENT
THE JET BROADCASTING CO., INC.
TELEVISION STATION WJET-TV
ERIE, PENNSYLVANIA

The statement was prepared on behalf of The Jet Broadcasting Co., Inc., licensee of television broadcast station WJET-TV Erie, Pennsylvania in support of further comments in connection with the FCC's Sixth Report and Order in MM Docket No. 87-268.

In previously filed comments, Jet requested assignment of a DTV channel which was located within the "core" spectrum and also one which would facilitate practical construction of the DTV facility. Several channels were suggested as a alternate to assigned DTV channel 58, with emphasis on DTV channel 42.

Review of potential DTV channels in light of recently released OET Bulletin No. 69 strongly suggests that DTV channel 42 is the most appropriate for use by WJET-TV. The attached Figure 1 is a tabulation of separations considering pertinent allotments associated with DTV use of channel 42 by WJET-TV. The pending application for use of channel 46 at Jamestown, NY was not considered, as acceptance by the FCC requires waiver of the "freeze", which was in effect at the time.

du Treil, Lundin & Rackley, Inc.

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Erie, Pennsylvania

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The two stations shown on Figure 1 which fail to meet separation requirements are Canadian NTSC channel 42 station CKCO-TV3 Sarnia, ON and DTV channel 42 station WPTT-TV Pittsburgh, PA. Using the method shown in OET Bulletin No. 69, potential interference to WPTT-TV from WJET-TV was determined to be 832 persons in an area of 33 square kilometers. Protection to a Canadian station such as CKCO-TV3 has not been prescribed by the FCC, therefore, it is not possible to establish a power level which would be acceptable to the Canadian Government. It is anticipated that protection to CKCO-TV3 would be quite similar to protection to a domestic station, such as WPTT-TV, due to the separation distances involved. WJET-TV would reduce power or install a directional antenna as necessary to protect CKCO-TV3.

For the interference study, the DTV facilities to employed by WJET-TV on channel 42 were assumed to be effective radiated power of 50 kilowatts and antenna height above average terrain of 290 meters.

du Treil, Lundin & Rackley, Inc.

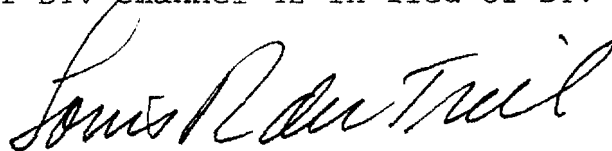
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Erie, Pennsylvania

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Conclusion

The use of DTV channel 42 by WJET-TV appears consistent with FCC allotment criteria. Channel 42 is superior to the assigned channel 58, and Jet Broadcasting requests assignment of DTV channel 42 in lieu of DTV channel 58.



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August 22, 1997

Figure 1

TECHNICAL STATEMENT
THE JET BROADCASTING CO., INC.
TELEVISION STATION WJET-TV
ERIE, PENNSYLVANIA

DTV to NTSC Separation Study

Job Title :WJET-TV Erie, PA DTV CH42
Zone : 1
Channel 42 (638-644 MHz)

Separation Buffer 32 km
FCC TV DB Date : 08/15/97
Coordinates : 42-02-24 80-04-08

| Call Status | City St | FCC File No. | Channel Zone | ERP(kW) HAAT(m) | Latitude Longitude | Bear. True | Dist. (km) | Req. (km) |
|---|------------|---------------|-----------------|--------------------|-----------------------|---------------|---------------|--------------|
| WKBNTV | YOUNGSTOWN | | 27(o) | 871 | 41-03-28 | 203.9 | 119.22 | 24.1/80.5 |
| LIC | OH | BLCT-2489 | I | 436 | 80-38-42 | | 38.72 | CLEAR |
| | BRANTFORD | | 34(+) | | 43-08-00 | 352.5 | 122.54 | 24.1/80.5 |
| ALLOC. ON | - | | I | 0 | 80-16-00 | | 42.04 | CLEAR |
| SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION. | | | | | | | | |
| WSEE | ERIE | | 35(+) | 1170 DA | 42-02-20 | 103.2 | .55 | 24.1/80.5 |
| LIC | PA | BLCT-820430KH | I | 287 | 80-03-45 | | 23.55 | CLEAR |
| CKCOTV3 | SARNIA | | 42(-) | 846 DA | 42-42-53 | 294.5 | 186.08 | 217.3 |
| LIC | ON | - | I | 303 | 82-08-12 | | -31.22 | SHORT |
| | NORMANDALE | | 44(+) | | 42-43-35 | 346.6 | 78.44 | 24.1/80.5 |
| ALLOC. ON | - | | II | 0 | 80-17-32 | | -2.06 | SHORT |
| NEW | JAMESTOWN | | *46(o) | 64.6 | 42-05-06 | 85.3 | 64.70 | 24.1/80.5 |
| APP | NY | BPET-900725KG | I | 206 | 79-17-23 | | -15.80 | SHORT |
| REQUESTS A WAIVER OF FREEZE 07-25-90 | | | | | | | | |
| | JAMESTOWN | | *46(o) | | 42-05-45 | 84.5 | 68.53 | 24.1/80.5 |
| ALLOC. NY | - | | I | 0 | 79-14-40 | | -11.97 | SHORT |
| | NEW CASTLE | | 56(-) | | 41-01-36 | 180.1 | 112.55 | 24.1/80.5 |
| ADD | PA | - | I | 0 | 80-04-20 | | 32.05 | CLEAR |
| SITE RESTRICTED: 23.5 KM EAST. | | | | | | | | |

** End of TV Separation Study for Channel 42 **

DTV To DTV Separation Study

| | | | | | | | |
|---------|------------|----|--------|----------|-------|--------|-----------|
| DWKBNTV | YOUNGSTOWN | 41 | 50.00 | 41-03-28 | 203.9 | 119.21 | 32.2/88.5 |
| DTVALT | OH | I | 436 | 80-38-42 | | 30.71 | CLEAR |
| DWPSTTV | PITTSBURGH | 42 | 316.60 | 40-26-23 | 170.6 | 180.12 | 196.3 |
| DTVALT | PA | I | 280 | 79-43-11 | | -16.18 | SHORT |

** End of DTV Separation Study for Channel 42 **